

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION**

This Document Relates To:

THE DEALERSHIP CLASS ACTION

MDL No. 2817

Case No. 18-cv-00864

**Honorable Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert**

**DEALERSHIP CLASS PLAINTIFFS' MOTION (i) TO COMPEL PRODUCTION OF
CDK/COX SETTLEMENT AGREEMENT; AND (ii) TO STAY WITTMAN
DEPOSITION PENDING RULING ON MOTION**

Dealership Class Plaintiffs ("Dealership Plaintiffs") respectfully move the Court, pursuant to Federal Rules of Civil Procedure 37(a)(1), for entry of an Order (i) compelling Defendant CDK Global, LLC ("CDK") to produce a copy of its settlement agreement and any related agreement ("Settlement Agreement") with former Plaintiff Cox Automotive, Inc. and its subsidiaries ("Cox"); and (ii) staying the deposition of Lori Wittman, Senior Vice President of Cox's Dealer Software Solutions division, pending a ruling on this Motion.

Pursuant to Local Rule 37.2, counsel for Dealership Plaintiffs certify that they have met and conferred with counsel for CDK, Cox and The Reynolds and Reynolds Company via telephonic conference as well as written communications in a good faith attempt to resolve the disputes presented by this Motion.

Dated: August 9, 2019

Respectfully submitted,

/s/ Peggy J. Wedgworth

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CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on August 9, 2019, I caused a true and correct copy of the foregoing DEALERSHIP CLASS PLAINTIFFS' MOTION (i) TO COMPEL PRODUCTION OF CDK/COX SETTLEMENT AGREEMENT; AND (ii) TO STAY WITTMAN DEPOSITION PENDNG RULING ON MOTION to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth